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January 28, 2008

Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
West Building Ground Floor
Room W12-140
Washington, D.C. 20590-001

Re: Saint Lawrence Seaway Development Corporation
Docket No. SLSDC 2007-0005 [RIN 2135-AA27]

To Whom It May Concern:

The Polish Steamship Company ("Polsteam") appreciates the opportunity to provide this letter through its counsel Carter Ledyard & Milburn LLP in response to the December 31, 2007 *Federal Register* notice by the Saint Lawrence Seaway Development Corporation ("SLSDC") seeking comments on its proposed rulemaking to update 33 CFR Part 401 (Docket No. SLSDC 2007-0005, as proposed at 72 *Fed. Reg.* 74247). In particular, SLSDC proposes to require foreign-flagged vessels to conduct saltwater flushing of each ballast water tank that contains residual amounts of ballast water and or sediment in an area 200 nautical miles from shore such that the resultant residual water remaining in a tank has a salinity level of at least 30 parts per thousand. The proposal is intended to mirror the existing Canadian regulations.

Polsteam, a foreign shipping company that transports goods across many countries including the United States, supports SLSDC's proposal and urges SLSDC to finalize the amendments to Part 401 prior to the spring 2008 shipping season. Polsteam currently requires that all its vessels, including those declaring no ballast water on board, conduct salt water flushing 200 miles out at sea, and such vessels also comply with the Code of Best Practices for Ballast Water Management of the Shipping Federation of Canada. Mandating salt water flushing as a requirement of United States law will result in no hardship to Polsteam. Instead, requiring vessels that declare no ballast water on board to conduct salt water flushing should result in considerable environmental benefit to the Great Lakes because recent scientific research has shown that salt water flushing can effectively reduce the introduction of aquatic nuisance species.¹

¹ See, e.g., U.S. Department of Commerce and National Oceanic and Atmospheric Administration, "Current State of Understanding about the Effectiveness of Ballast Water Exchange (BWE) in Reducing Aquatic Nonindigenous

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Thank you again for the opportunity to submit this comment letter on an issue of critical importance to the international shipping industry.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Christine A. Fazio', written in a cursive style.

Christine A. Fazio

cc: Jan Rutkiewicz, President, Polsteam USA Inc.
Donald J. Kennedy, Esq.